

Message

From: Leathers, James [Leathers.James@epa.gov]
Sent: 7/22/2020 1:28:31 PM
To: Casso, Ruben [Casso.Ruben@epa.gov]
Subject: FW: Air monitoring around Denka: next steps

James Leathers
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From: Thompson, Steve <thompson.steve@epa.gov>
Sent: Tuesday, July 21, 2020 4:44 PM
To: Leathers, James <Leathers.James@epa.gov>; Lannen, Justin <Lannen.Justin@epa.gov>; Barnett, Cheryl <Barnett.Cheryl@epa.gov>
Subject: FW: Air monitoring around Denka: next steps

From: Gray, David <gray.david@epa.gov>
Sent: Tuesday, July 21, 2020 3:17 PM
To: Garcia, David <Garcia.David@epa.gov>; Seager, Cheryl <Seager.Cheryl@epa.gov>
Cc: Robinson, Jeffrey <Robinson.Jeffrey@epa.gov>; Thompson, Steve <thompson.steve@epa.gov>
Subject: RE: Air monitoring around Denka: next steps

We need a call.

From: Garcia, David <Garcia.David@epa.gov>
Sent: Tuesday, July 21, 2020 2:31 PM
To: Gray, David <gray.david@epa.gov>; Seager, Cheryl <Seager.Cheryl@epa.gov>
Cc: Robinson, Jeffrey <Robinson.Jeffrey@epa.gov>; Thompson, Steve <thompson.steve@epa.gov>
Subject: FW: Air monitoring around Denka: next steps

To All,

Mike Koerber and OECA are asking if we are good with the following: of OAR is asking if we are good with the following. Pls read email train below for more detail.

We (OECA) plan to pull SPod comparison samples beginning with the samples planned for August 2nd-3rd, and during the months of August and September, whereby one SPod sample would be collected concurrently with the every six day sample collection. The comparative sample location would rotate amongst the Levee, Elementary School and Chad Baker SPod locations.

David F. Garcia, P.E.
Director
Air and Radiation Division
Ph. 214 665 7593

U.S. EPA Region 6
1201 Elm Street
Dallas, Texas

From: Koerber, Mike <Koerber.Mike@epa.gov>
Sent: Tuesday, July 21, 2020 2:14 PM
To: Garcia, David <Garcia.David@epa.gov>; Robinson, Jeffrey <Robinson.Jeffrey@epa.gov>; Verhalen, Frances <verhalen.frances@epa.gov>; Wayland, Richard <Wayland.Richard@epa.gov>; Weinstock, Lewis <Weinstock.Lewis@epa.gov>
Subject: FW: Air monitoring around Denka: next steps

Please let me know if you are okay with this. It looks fine to me.

Mike

From: Hoyt, Daniel <Hoyt.Daniel@epa.gov>
Sent: Tuesday, July 21, 2020 3:08 PM
To: Koerber, Mike <Koerber.Mike@epa.gov>
Subject: RE: Air monitoring around Denka: next steps

Hi again Mike,

Per your previous email request, I can confirm that we will be implementing comparative sampling using the SPods at the Levee, Elementary School or Chad Baker location, during the every six day sampling, for a co-located sample comparison. However, just to make sure we're on the same page, I'd like to confirm the objectives and plan with you, so as to provide additional clarity.

We plan to pull SPod comparison samples beginning with the samples planned for August 2nd-3rd, and during the months of August and September, whereby one SPod sample would be collected concurrently with the every six day sample collection. The comparative sample location would rotate amongst the Levee, Elementary School and Chad Baker SPod locations.

Ex. 5 Deliberative Process (DP)

Feel free to give me a call, or set up a time to talk, if you would prefer to respond that way.

Regards,

Dan

Daniel Hoyt, Environmental Engineer
US Environmental Protection Agency
Office of Enforcement and Compliance Assurance
Office of Civil Enforcement - Air Enforcement Division
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WJC-S, MC 2242A
Washington, DC 20460 (mail) or 20004 (courier)

From: Koerber, Mike <Koerber.Mike@epa.gov>
Sent: Tuesday, July 14, 2020 9:17 AM
To: Hoyt, Daniel <Hoyt.Daniel@epa.gov>
Subject: RE: Air monitoring around Denka: next steps

Thanks, Dan. Yes, good question. What we were hoping is that at least one location (Elementary School, Chad Baker, or Levee) would sample one day every sixth day (1-in-6-day schedule) in addition to the triggered high concentration event.

Mike

From: Hoyt, Daniel <Hoyt.Daniel@epa.gov>
Sent: Tuesday, July 14, 2020 9:09 AM
To: Koerber, Mike <Koerber.Mike@epa.gov>
Subject: RE: Air monitoring around Denka: next steps

Mike,

Let me check in with my management about sampling with the SPods on a regular 1-in-6-day schedule. Can you provide more clarity about what you mean when you say "one or more SPods" would sample on the 1-in-6 day schedule?

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

-Dan

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From: Koerber, Mike <Koerber.Mike@epa.gov>
Sent: Tuesday, July 14, 2020 8:22 AM
To: Hoyt, Daniel <Hoyt.Daniel@epa.gov>
Subject: FW: Air monitoring around Denka: next steps

Dan: Good morning. I just wanted to touch base on the monitoring around Denka. Here is a note that I sent to my management in OAR about our plans. OECA, of course, is a key player in this plan going forward. Please let me know if I got anything wrong.

Note that there are several assumptions here about the OECA monitoring:

Ex. 5 Deliberative Process (DP)

Mike

From: Koerber, Mike

Sent: Tuesday, July 14, 2020 8:17 AM

To: Harlow, David <harlow.david@epa.gov>; Raymond, Kelley <Raymond.Kelley@epa.gov>; Cory, Preston <Cory.Preston@epa.gov>

Subject: Air monitoring around Denka: next steps

David, Kelley, Preston: I would appreciate OAR's feedback on our plan to transition the air monitoring program around the Denka facility in LaPlace, Louisiana. Given Anne's prior discussions with David Gray on this matter, please check in with her about her thoughts.

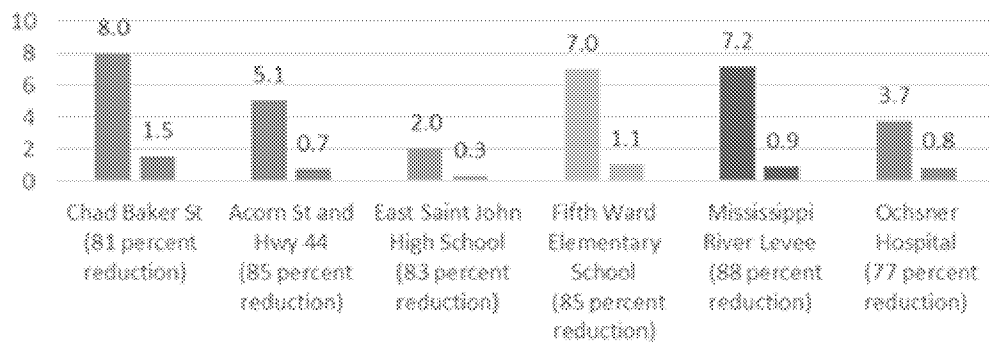
After further discussions with Region 6, we have outlined the following transition plan:

Ex. 5 Deliberative Process (DP)

Background

EPA has been conducting monitoring for chloroprene concentrations in the communities around Denka since May 2016 in response to the 2011 NATA (note: this is not the most recent NATA which generated all the ethylene oxide excitement, but the prior NATA). Since we started monitoring, the company has installed pollution controls (i.e., a Regenerative Thermal Oxidizer or RTO) and reduced emissions on the order of 80-85%. As a result, we have seen a substantial reduction in chloroprene concentrations in the area – see below.

Comparing pre-RTO (annual) and post-RTO average chloroprene concentrations ($\mu\text{g}/\text{m}^3$)



first pre-RTO annual average 5/25/2016 - 5/23/2017

last post-RTO annual average 6/16/2019 - 6/10/2020